



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7**

11201 Renner Boulevard  
Lenexa, Kansas 66219

**DEC 01 2015**

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Article Number: 7014 1200 0000 6123 9972

Mr. Phillips Lamb  
Plant Manager  
Americana Company, Inc.  
415 North Burnett  
Shenandoah, Iowa 51601

RE: Americana Company, Inc.  
Shenandoah, Iowa  
RCRA ID No.: IAR000503318

Dear Mr. Lamb:

Letter of Warning/Request for Information

On September 11, 2014, a representative of the U. S. Environmental Protection Agency (EPA) inspected your facility. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA).

My staff has reviewed the inspection report, your January 14, 2015, response to the Notice of Preliminary Findings (NOPF), and your October 7, 2015, response to the EPA's June 18, 2015, Letter of Warning/Request for Information and determined that violations of RCRA were documented. We are requesting additional information regarding your facility's compliance status. Enclosed is a list of violations followed by a list of questions and/or requested information. Also enclosed are instructions to be used in providing your response. Please carefully read and follow these instructions. Your response to this request in accordance with the instructions is required by Section 3007 of RCRA and substantial penalties may result from not complying. Please note that the EPA reserves its right to pursue appropriate enforcement actions, including penalties, for violations discovered as a result of the inspection, regardless of whether the violations were subsequently corrected.



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Within thirty (30) calendar days of receiving this letter, please mail your response to: Deborah Bredehoft, AWMD/WEMM, U. S. Environmental Protection Agency, 11201 Renner Boulevard, Lenexa, Kansas 66219. To request an extension of the time limit, follow the instructions in the enclosure. Please direct all questions concerning this letter to Ms. Bredehoft, of my staff, at (913) 551-7164.

Sincerely,



Donald Toensing  
Chief

Waste Enforcement and Materials Management Branch  
Air and Waste Management Division

Enclosures (3)

cc: Mr. Cal Lundberg, Chief, Contaminated Sites Section  
Iowa Department of Natural Resources

List of Violations  
Americana Company, Inc.  
Shenandoah, Iowa  
RCRA ID No.: IAR000503318

1. 40 CFR 262.40(a) - Failure to maintain manifests on-site for three years.
2. Rescinded
3. 40 CFR 262.11 - Failure to make a hazardous waste determination on the following:
  - a. powder coating waste; and
  - b. lamps.
4. 40 CFR 268.7(a)(2) - Failure to include the manifest number, treatment standard, and waste analysis data on the Land Disposal Restriction (LDR) notifications.
5. 40 CFR 268.7(a)(8) - Failure to maintain copies of LDR notifications on-site for 3 years.
6. 40 CFR 262.34(d)(4) referencing 40 CFR 265.37 - Failure to make arrangements with local authorities.
7. 40 CFR 262.34(d)(5)(i) - Failure to have an emergency coordinator on the premises or on call.
8. 40 CFR 262.34(d)(5)(ii) - Failure to keep the emergency coordinator's name and phone numbers, the fire department's phone number, and the location of fire extinguishers and spill control equipment posted near the phone.
9. 40 CFR 262.34(d)(4) - Failure to date 15 bags of plating sludge.
10. 40 CFR 262.34(d)(4) ref. 40 CFR 262.34(a)(3) - Failure to label 12 bags of plating sludge with the words "Hazardous Waste."
11. 40 CFR 262.34(d)(4) ref. 40 CFR 262.173(a) - Failure to keep 12 bags of plating sludge closed.
12. 40 CFR 265.34(d)(4) ref. 40 CFR 265.35 - Failure to maintain adequate aisle space.
13. 40 CFR 262.34(f) and RCRA Section 3005 - Storage of bags of plating sludge for greater than 270 days without a permit.
14. 40 CFR 262.34(d)(2) ref. 40 CFR 265.174 - Failure to inspect the container accumulation area (CAA) on a weekly basis.
15. 40 CFR 262.34(d)(4) ref. 40 CFR 265.32(b) - Failure to have a device capable of immediately summoning emergency assistance in the CAA.
16. 40 CFR 262.34(d)(4) ref. 40 CFR 265.32(c) - Failure to provide adequate supply and proper spill control, decontamination and safety equipment in the CAA.

17. 40 CFR 262.34(d)(4) ref. 40 CFR 265.33 - Failure to test communication and emergency equipment.

18. 40 CFR 262.34(d)(4) ref 40 CFR 265.31 - Failure to minimize the possibility of a release.

19. 40 CFR 262.34(d)(5)(iv)(B) - Failure to contain and clean up a hazardous waste spill.

20. 40 CFR 262.34(d)(5)(iii) - Failure to ensure all employees are familiar with waste handling and emergency procedures relevant to their responsibilities.

Requested Information  
Americana Company, Inc.  
Shenandoah, Iowa  
RCRA ID No.: IAR000503318

1. Please provide the following information regarding your zinc plating line with a chrome rinse tank:
  - a. state if Americana completes zinc plating on any materials other than carbon steel;
  - b. if Americana completes zinc plating on any materials other than carbon steel, please provide the following:
    - i. the materials, other than carbon steel, that are zinc plated;
    - ii. the approximate percentage of Americana's total zinc plating that is conducted on materials other than carbon steel;
  - c. state the purpose of the chrome rinse at the end of the zinc plating process;
  - d. state if all items or only a portion of the items are sent to the chrome rinse;
  - e. state the percentage of the items that are sent to the chrome rinse after the zinc plating process; and
  - f. state if any electricity is utilized with the chrome rinse portion of the plating process.
2. With regard to Violation Number 3.a., as part of the previously requested hazardous waste determination, the EPA was provided material safety data sheets (MSDS) demonstrate the presence of barium sulfate at 4.5-6% in the White Texture Polyester and 20-30% in the Grey Speckle Polyester. Within Americana's October 7, 2015, response, this waste was stated not to be a listed or characteristic hazardous waste; however, no documentation was provided to show that the barium content was below the toxicity characteristic leachate procedure (TCLP) limit of 100 milligrams per liter (mg/L). Please provide documentation that the powder coating waste will not leach barium at greater than 100 mg/L.
3. With regard to Violation Number 3.b., Americana provided the following information:
  - Lamp Material Information Sheet from GE
  - Two MSDSs from Philips
  - Two MSDSs from GEThe provided information did not specify the type(s) of lamps used at the facility and did not include any TCLP data to demonstrate that the mercury level is below 0.2 mg/L. However, the MSDS for Philips Fluorescent Lamp F96 T12 HO/EW, HO-O and VHO Lamps states that "[a]s a waste, these spent fluorescent lamps would be regulated in various states and local communities" and the GE MSDS for 2YGD9 – Metal Halide Lamp ED 28 250W states "[a] toxicity characteristic leaching procedure test conducted on the lamp for lead or mercury could cause the lamp to be classified as a hazardous waste." Please conduct a complete hazardous waste determination on these lamps (as was outlined in the EPA's June 18, 2015, letter) and include the following:
  - a. the type(s) of lamps(s) used at Americana;
  - b. state if each type the lamp(s) when discarded is hazardous waste and provide supporting documentation; and
  - c. state how (and provide supporting documentation) outlining how Americana will manage its lamps in the future.

### 3007 RESPONSE INSTRUCTIONS

- \* Identify the Person(s) responding to this request on your behalf.
- \* Address each numbered item separately, and precede each answer with the number of the item to which it responds.
- \* For each numbered item, identify all documents consulted, examined, or referred to in the preparation of the answer, or that contain information responsive to the requested item. Provide true, accurate, and legible copies of all such documents. (If information responsive to an item is available but there are no relevant source documents, you must still provide the information.)
- \* For each document provided, indicate on the document (or in some similar manner) the number of the item to which it responds.
- \* For each numbered item, identify all persons consulted in the preparation of the answer.
- \* For purposes of this request, the term "you" or "your" refers to the company, corporation and any officer, principal, agent employee, or any other person(s) associated in any capacity.
- \* If information responsive to a requested item is not in your possession, identify the person(s) from whom the information may be obtained.
- \* If information that is not known or available at the time you make your response later becomes known or available to you, you must supplement your response.
- \* If, at any time after you submit your response, you find that any part of the information you submitted is incomplete, false, or misrepresents the truth, you must notify the EPA immediately.
- \* You must provide the requested information even though you consider it confidential information or trade secrets. If you want to make a confidentiality claim covering part or all of the information submitted, identify the material with words such as "trade secret," "proprietary," or "company confidential."
- \* The EPA will disclose this information only to the extent and by the means described in 40 CFR Part 2, Subpart B., provided that it qualifies as confidential business information.
- \* A request for an extension to the time limit for responding must be in writing and must be postmarked within five (5) calendar days of receipt of this information request. Address it to the person identified in the cover letter to receive your response.
- \* Copies of the Code of Federal Regulations may be obtained from the U.S. Government Bookstores or on the Internet at [www.epa.gov/epahome/cfr40.htm](http://www.epa.gov/epahome/cfr40.htm).
- \* This request for information is not subject to the approval requirements of the Paperwork Reduction Act of 1980.
- \* The EPA encourages you to conserve resources. Suggested methods include use of recycled paper, printing on both sides (duplex printing), and when possible submitting documents electronically (i.e., email or compact discs). If hard copy submittals are necessary, please do not submit documents in binders.

Not responding to this information request within the stated time limit and in accordance with these instructions may subject your facility to an enforcement action which could include the imposition of penalties of up to \$37,500 per violation, per day of continued noncompliance. Providing false, fictitious, or fraudulent statements or representations could lead to criminal penalties.